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VIA HAND DELIVERY

Honorable Lee Ann Elliott Chairman Federal Election Commission 999 E Street, N.W. Washington, D.C. 20463

Re: Complaint Against the Democratic National Committee and the "Torricelli for U.S. Senate/Bob Torricelli for New Jersey" Committee

Dear Madam Chairman:

Pursuant to the authority found at 2 U.S.C. §437g(a)(4)(A), I file this formal complaint with the Federal Election Commission (the "Commission"). This complaint alleges a series of violations of the Federal Election Campaign Act of 1971, as amended, (the "Act") by the Democrat National Committee (the "DNC") with respect to the November, 1996 general election for United States Senator from New Jersey. I respectfully request that the Commission move forward to investigate this complaint, as is provided for at 2 U.S.C. §437g(a)(2). The complaint, on information and belief, alleges violations of 2 U.S.C. §§441a(a)(2), 441a(d), 441b(a), 441d, 434b and 11 C.F.R. §110.11(a)(2) involving the unlawful financing of a television advertisement by the Respondent DNC in connection with the general election campaign of Congressman Bob Torricelli, the Democrat nominee for election to the United States Senate from New Jersey.

FACTS: On or about June 1, 1996, Respondent Torricelli Committee retained the Alexandria, Virginia-based media firm of Abar Hutton Media (the "Abar firm"), to purchase television time for its political advertising with respect to the 1996 New Jersey election for United States Senate. In so doing, the Abar firm, through its principal, Barb Abar, has purchased time on New York stations, including WABC-TV and WCBS-TV, for the purpose of airing one or more political advertisements in opposition to the candidacy of Republican candidate for election to the United States Senate, Dick Zimmer (see "Exhibit 1"). One of these advertisements is

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referred to by Respondent Torricelli Committee, on information and belief, as "Zimmer: Not On Our Side." The text for this advertisement is attached as "Exhibit 2".

On or about August 1, 1996, Respondent DNC also contracted with the Abar firm to purchase television time on New York stations, including WABC-TV and WCBS-TV, for the purpose of airing one or more political advertisements in opposition to the candidacy of Republican candidate for election to the United States Senate, Dick Zimmer. One of these advertisements is referred to by the Respondent DNC, on information and belief, as "24 Times Against Medicare." The text for this advertisement is attached as "Exhibit 3." In fact, the placement of the advertisement by the Abar firm on behalf of the Respondent Torricelli Committee dove-tailed with the placement of the advertisement by the Abar firm on behalf of the Respondent DNC, (see "Exhibits 1 and 6").

I am reliably informed that Barb Abar of the Abar firm initially contacted Ms. Dee Rizzuto of WABC-TV on or about September 15, 1996 to purchase air time, at the "lowest unit rate", to televise the "Zimmer: Not On Our Side" advertisement on station WABC-TV through November 4, 1996 as a political advertisement. I am also reliably informed that on or about September 30, 1996, Barb Abar again contacted Ms. Rizzuto at WABC-TV and changed the "buy order" previously agreed to so as to utilize the same air time on behalf of the Respondent DNC to televise the "24 Times Against Medicare" advertisement as an exempt "issue" advertisement (see "Exhibit 4").

The advertisement which is the subject of this complaint ("24 Times Against Medicare") utilizes a text which discusses in the most vague way the proposition that Republican Senate candidate Dick Zimmer (specifically referred to by name and photograph in the text of the advertisement) has voted in Congress, in the past, to "destroy Medicare." The text of this advertisement fails to focus on any identified legislative initiative pending before the U.S. Congress at the time the advertisement aired. This advertisement contains explicit references to the pending election for United States Senate in New Jersey and to the candidacy of Dick Zimmer. This advertisement contains a clear and unambiguous "electioneering message" in opposition to the candidacy of Dick Zimmer (see "Exhibit 5").

Upon information and belief, the Respondents coordinated their television media strategy in opposition to Republican candidate Dick Zimmer. The Abar firm, through its principal Barb Abar, is



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retained by both Respondents to place political advertising on New York television stations in connection with the November, 1996 general election for United States Senator from New Jersey and in opposition to candidate Dick Zimmer.

Pursuant to 47 C.F.R. §73.1943, television stations are required by the Federal Communications Commission to maintain, for public inspection, a copy of "buy" orders for political advertising carried on that station. When contacted directly and asked to produce a copy of the "buy" order for the "24 Times" advertisement aired by the Respondent DNC, several stations refused to comply with this request for the stated reason that the stations considered these advertisements to be "issue advertising", not political advertising. An independently obtained copy of a summary of some of the "issue advertising" buy-orders for the "24 Times" advertisement is attached as "Exhibit 6."

As the Commission knows, the Respondent DNC may accept individual contributions, for its so-called "non-federal" account, in amounts which would be in excess of the limitations placed upon contributions to a federal committee by 2 U.S.C. 441a(a)(1)(C). As the Commission also knows, Respondent DNC may also accept contributions from the treasury funds of corporations and labor organizations, for its so-called "non-federal" account, which would be prohibited for use in a federal election by 2 U.S.C. 441b.

Upon information and belief, Respondent DNC paid for the costs of the advertisement at issue in this complaint as an exempt administrative or "issue" expense, using a mix of federal and nonfederal funds.

Upon information and belief, Respondent DNC used corporate treasury funds, labor organization treasury funds and/or excessive personal contributions in its "non-federal" account in paying for this advertisement as an exempt administrative expense.

THE LAW: The law with respect to advertisements of this nature is well settled. Expenditures or disbursements made by the Respondent DNC in connection with a federal election, such as the November, 1996 election for United States Senator from New Jersey, are regulated and limited by the Act. The law requires that the Respondent DNC must treat the preparation and placement costs of the advertisement at issue in this complaint as either a "coordinated expenditure" on behalf of the Respondent Torricelli Committee or as a "administrative expense", pursuant to 11 C.F.R. §106.5(a)(2).

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Whether this expenditure by the Respondent DNC is to be treated as an "administrative expense" (the funding for such an expense being appropriately allocated, according to the formula previously established by the Commission, between the Respondent's federal and non-federal accounts) or as a "coordinated expenditure" will turn on (a) the exact text of the advertisement, (b) the geographic "placement" and timing of the media "buy" to air the advertisement, and (c) if the advertisement is prepared and aired in coordination with the benefiting federal campaign.

LEGAL ANALYSIS: Upon information and belief, the Respondent DNC has not deemed this media "buy" to be a "coordinated expenditure", but rather considers the "buy" to be an exempt national party "administrative" expense. This supposition is supported by the response of New York television station managers that the advertisement in question is an "issue" not a political advertisement and that the buy-orders for such advertisements need not be made available for public inspection under 47 C.F.R. 73.1943. This supposition is further supported by Respondent DNC's use of its own disclaimer at the end of the advertisement.

With respect to the advertisement at issue in this complaint, the law requires that the production and placement costs associated with these advertisements be posted to the Respondent DNC "coordinated" contribution limit for New Jersey because (a) the text of these advertisements fails to employ the required "call to action" for the viewer to urge an identified officeholder and candidate to take an action on a legislative matter pending before his or her legislative body, (b) the placement and timing of these advertisements strongly suggests that Respondent DNC's sole purpose in sponsoring this advertisement was to "inform" the largest number of viewers possible in New Jersey that Republican Senate candidate Dick Zimmer had, some how, voted to "destroy Medicare", and (c) of the obvious coordination between Respondents in the placement of the advertisement.

a. <u>Message</u>: As outlined in Advisory Opinion 1995-25, the Commission has previously taken the position that in order for so-called "issue advertising" to fall outside the definition of a "contribution" or "expenditure" and thus be deemed an "administrative expense" or an expense aimed at a "generic voter drive" (pursuant to 11 C.F.R. §106.5(b)(2)), the text of the advertisement must meet a series of defined tests, including (1) if the text mentions any federal candidate, that there is no "express advocacy" of the candidate's election or defeat, nor can there be any reference to any "electioneering message" or reference to a

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federal election, (2) if there is a specific "call to action" in the text, that the "call to action" will urge the viewer to contact the federal candidate urging support for, or defeat of, a particular piece of legislation, and (3) the production and placement costs of the "issue advertising" must be allocated, pursuant to the Commission's formula, between a party committee's federal and non-federal accounts.

With respect to the advertisement at issue in this complaint, the text does <u>not</u> meet the stated requirements laid out by the Commission in AO 1995-25 regarding both the absence of any "express advocacy" and the nature of the "call to action" contained in the issue advertisement. In the advertisement placed by the Respondent DNC, there is unambiguous "express advocacy" in opposition to the candidacy of Dick Zimmer and a "call to action" which does not relate to any legislative issue pending before the United States Congress and which cannot even be acted upon by candidate and officeholder Zimmer for the reason that the U.S. Congress has adjourned sine die for the remainder of the year.

- b. <u>Placement and Timing</u>: These advertisements were placed on television stations in New York for the sole purpose of <u>expressly advocating</u> opposition to and the defeat of candidate Dick Zimmer. The advertisement known as "24 Times Against Medicare" continues to run on New York television stations weeks after the U.S. Congress adjourned sine die for the remainder of the year.
- c. <u>Coordination with the Torricelli Campaign</u>: In placing this advertisement, the Respondent DNC employed the media firm headed by Barb Abar (the firm of Abar Hutton Media), which is the same media firm currently employed by the Respondent Torricelli Committee to place political advertising on his own behalf on New York television stations. This fact alone presents prima facia evidence of "coordination" between the Respondents in this matter.

STATUTORY VIOLATIONS: Because the Respondent DNC erroneously thought this advertisement to be an exempt "issue" advertisement, said Respondent had to pay for the production and placement costs associated with this advertisement using the federal/non-federal allocation formula previously established by the Commission for "administrative expenses." As the Commission knows, by operation of law said Respondent is allowed to accept corporate treasury funds, labor organization treasury funds and excessive personal contributions for its "non-federal" account. Since this advertisement does not meet all of the tests for an exempt "issue" advertisement outlined in AO 1995-25, said

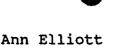
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Respondent's use of any corporate treasury funds, labor organization treasury funds or excessive personal contributions for the payment any of the costs associated with this advertisement is a specific violation of 2 U.S.C. §441a(a) and §441b.

Further, because the law deems this media "buy" to be a "coordinated expenditure" on behalf of the Respondent Torricelli Committee, the Respondent DNC is in violation of the Commission's regulation with respect to the proper disclaimer to be used by a party committee for a "coordinated" political advertisement, 2 U.S.C. §441d(a)(2). "Coordinated" party expenditures must carry a Commission approved "disclaimer" identifying the sponsor of the advertisement, the benefiting federal committee and indicating that there has been coordination between the sponsoring party committee and the benefiting federal campaign (see 11 C.F.R. §110.11(a)(2)).

Further, because the law deems the disbursements made to produce and air these advertisements to be "coordinated expenditures" on behalf of the Respondent Torricelli Committee, the Respondent DNC must reflect these expenditures (including the actual costs associated with the production of this advertisement) on its reports to the Commission, pursuant to 2 U.S.C. 434b, and treat the costs of these advertisements as part of the party committee coordinated contribution limit applicable to New Jersey.

CONCLUSION: Given the violations of the Act described above, I urge the Commission to (1) find that the Respondents and their Treasurers violated 2 U.S.C. §441a(a)(2), 441a(d), 441b(a), 441d, 434b and 11 C.F.R. §110.11(a)(2) regarding the financing of the advertisements at issue in this complaint on television stations throughout New Hampshire; (2) find that the Respondents and their Treasurers will knowingly and willfully violate 2 U.S.C. §434b should they fail to adequately report the "co ordinated expenditures" that were made in connection with the preparation and placement of these advertisements; (3) impose appropriate penalties for such violations; and (4) order the



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Respondents to withdraw these advertisements and terminate all present and future television "buys" in support of these advertisements.

Respectfully,

Craig M. Engle, Esq. General Counsel

National Republican Senatorial

Committee

Ronald Reagan Republican Center

425 Second Street, N.E. Washington, DC 20002

Exhibits Attached

Subscribed and sworn to before me this 10 TH day of October, 1996

Notary Public

My Commission expires Nov 20, 1996

WAS-201400

WABC-TV NEW YORK, N.Y. 10023



WABC-TV 7 Lincoln Square New York, New York 10023 (212) 456-3024 Fax (212) 456-3222



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*THIS AGREEMENT IS SUBJECT TO THE TERMS AND CONDITIONS INDICATED ABOVE, AND ON THE REVERSE SIDE HEREOF.

TELEVISION CONFIRMATION CONTRACT

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WABC-TV NEW YORK, N.Y. 10023



WABC-TV 7 Lincoln Square New York, New York 10023 (212) 456-3024 Fax (212) 456-3222

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WABC-TV 7 Lincoln Square New York, New York 10023 (212) 456-3024 Fax (212) 456-3222

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WABC-TV
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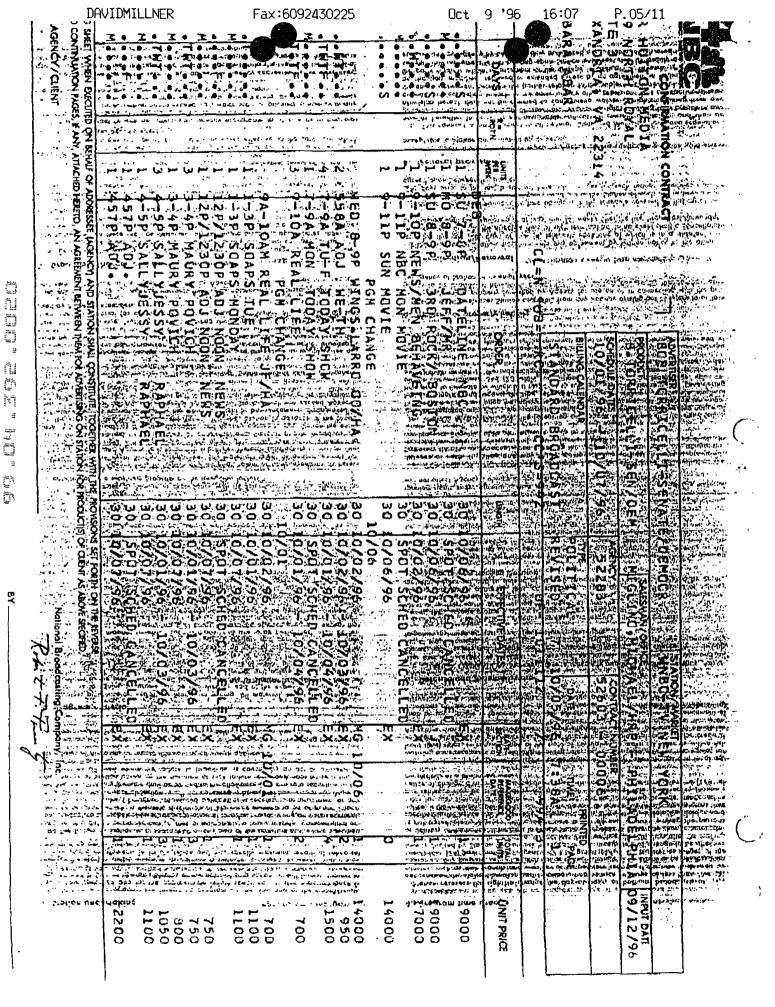
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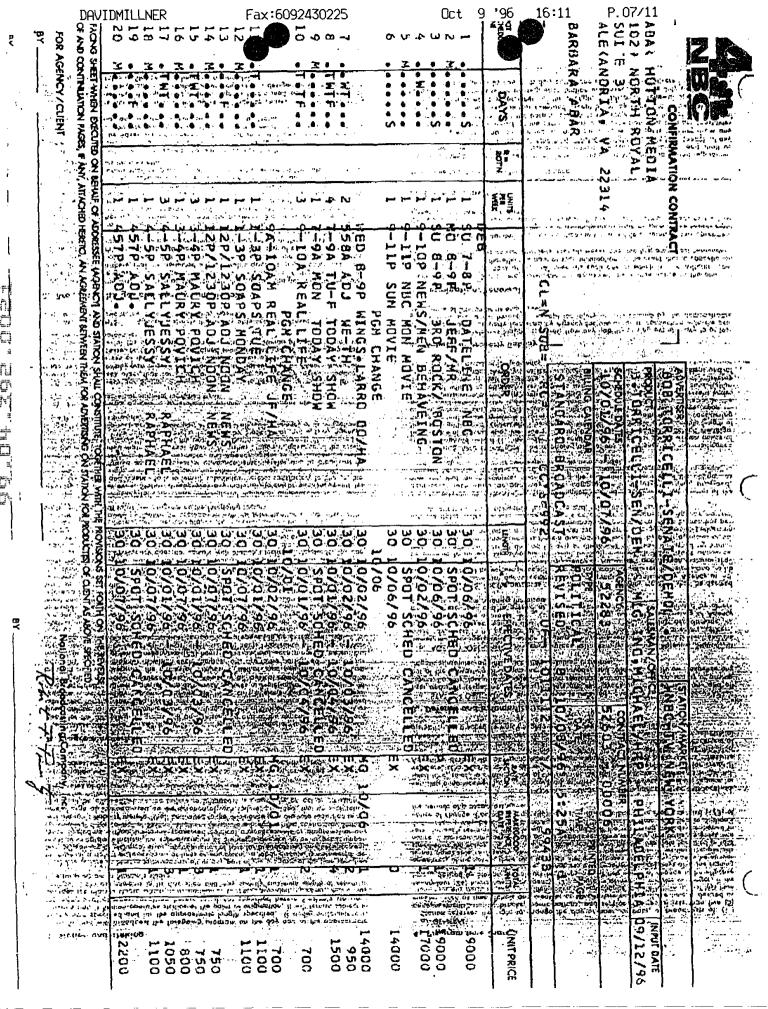
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CAPITAL CITIES / ABC INC. 4100 CITY LINE AVE. PHILADELPHIA, PA 19131 TELEPHONE (215) 878-9700

ABAR HUTTON MEDIA 1029 W ROYAL STREET SUITE 330 ALEXANDRIA, VA 22314

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EPRESENTATIVE			AS AGENT FOR W	PVI-TV		TITLE	

THIS CONTRACT IS SUBJECT TO THE TERMS AND CONDITIONS INDICATED ABOVE, AND ON THE REVERSE SIDE HEREOF, ACCEPTANCE OF ITS TERMS SHALL BE COMPLISHED EITHER BY SIGNING OR BY THE FURNISHING OF COMMERCIAL ANNOUNCEMENTS.

NATE PROTECTION AND PRODUCT PROTECTION WILL FOLLOW POLICY OUTLINED IN STATION'S CURRENT STANDARD RATE AND DATA LISTING

P.09/11

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96, 6 120

Fax:6092430225

APPROVED FOR MPVI-TV PER:

DHAIDMIFFMEK



60

WPVI-TV

CAPITAL CITIES / ABC INC. 4100 CITY LINE AVE. PHILADELPHIA, PA 19131 TELEPHONE (215) 878-9700

Agreement Between WPVI-TV and ABAR HUTTON MEDIA

Acknowledgement of

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1029 W ROYAL STREET SUITE 330 ALEXANDRIA: VA 22314

ONTRACT NO AGENCY CUSTOMES NO. DATE ENTERED. MARRIMENT DATE AMERICAN REPORT MARRIAGE STATES OF THE PROPERTY OF PVI-TV TORRICELT POR USERVI Total of the Pier 100 10 7/30/ STATUTE TO THE TOTAL TO THE STATE OF THE STA , MAKEGOOD TORRICEULI FOR US SENATE I BY PAID ROR A c STEPHEN MOSES - TREASURER αb 是自己 100 COLUMN IS AN AMENDHENT - CURRENT CHANGES IDENTIFIE "Hมีร inac Lie 1 6APOL 9/28/95 9/28/96 30 SA 9-9P 3;500 . 1 đi. i. 8-9P 39POL 8,000 9/25/98 30 WE $P_{\overline{\mathcal{M}}}^{\infty}$ 9/25/96 on: 7EP OL 9/29/95 テノエテノテム 30 ISU 9-11 PM 963 4,500 . 3 ROTATING ,,,, 9/27/96 30 TU-FR 7-9 AM GMPOL 800 9/24/96 ٠i÷ 3 AMP OL デノミルノタる タノネブノタム 30 TUHER 9A-12N 300 :=: CROMATING 3 PMFOL 9/24/96 9/27/94 30 TU-FR 12~4 FM 800 .6 ÷ TU-FR 4-5 PM OR CENTAL TENIES EFFOL 1/600 タノネフノタム 5V 7 タノミサノダム **学者以及**有世界 ACE OL 2,400 タノミサノダム 9/27/96 30 TU-FR 7-8 PM រក្ន 1,450 TU-FR 1135P-1207 NLPOL 9/24/93 9/27/95 30 ٠5 toria Hov GSFOL 250 9729796 9/29/96 30 SU 3~9台村 Ó S . SMPOL 300 9/29/96 ΦĒ SU 1030-11A タノエマノダム ż DEPOL 1,200 9729796 30 SU 11A-12P ROTATING 9/29/96 9/29/96 30 TU-5U 5-730P NWS 3 ENPOL 2:000 タノシサノウム **MARCHAT THE** SMEDL 2:800 9/24/96 9/27/96 30 TU-FR 5-630F ROTATING 30 TU-5U 11-1135NWS LNFUL 3,325 9/29/96 ゲノミサノデる Ξ PEPOL 35.000 30 MD 9P-1230M 9/30/96 9/30/95 ъ. **经有着更多发生** à ld 10 III 10 III 10 III inco inco hier prapüe: Dan 1 pu s late. Or. F # Y-* ----Ġ. D T 4.3 in. Heater ! . 13471.5 ma nce gerin. 140 . ينظ. 14. 1)----£ /1-31: Ŋ'n. 世: ,277 m 85. 170 *41 ė". 31.0 900

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DUNIDWITTMEK

Acknowledgement of Agreement Between WPVI-TV and



CAPITAL CITIES / ABC INC. 4100 CITY LINE AVE.
PHILADELPHIA, PA 19131
TELEPHONE (215) 878-9700

ASAR HUTTON MEDIA 1029 W ROYAL STREET SUITE 330 ALEXANDRIA: VA 22314

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REPRESENTATIVE	luz Dr			WPVI-TV		TITLE
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VIDEO MONITORING SERVICES OF AMERICA, L.P.

330 WEST 42ND STREET. NEW YORK, NEW YORK 10036 (212) 736-2010



LENGTH: MARKET:

CODE #: TITLE:

PRODUCT: Bob Torricelli :30

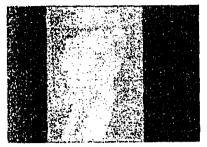
New York City PROGRAM: Gordon Elliott

9609-3112 TIME: Zimmer: Not On Our Side

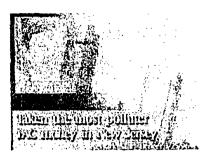
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09/17/96

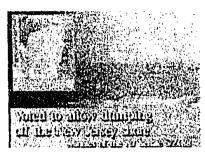
9:60 AM



(BKGD MUSIC) MALE ANNCR: Now Jersey, meet Dick Zimmer.



He's taken more money from polluters than anyone else in this state



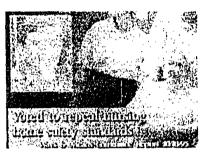
and voted to allow ocean dumping off the Jersey shore.



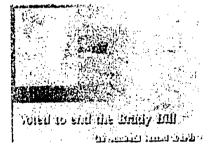
He voted against covering mammograms to detect breast



to repeal nursing home



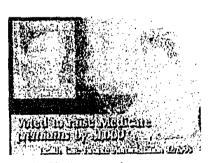
safety standards,



and to end the Brady Bill so hand guns could be sold to criminals with no waiting period.



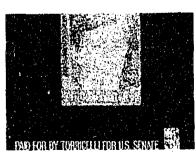
He voted to cut Medicare 25 times and



to raise Medicare premiums



by nearly \$1,000.



Dick Zimmer.



He's not on our side. (MUSIC ENDS)

VIDEO MONITORING SERVICES OF AMERICA, L.P.

330 WEST 42ND STREET. NEW YORK, NEW YORK 10036 (212) 736-2010

LENGTH:

MARKET:

TITLE:

PRODUCT: Democratic Nation :30

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CBS

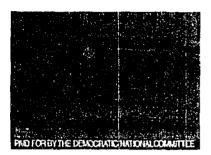
10/03/96

P.02/02

PROGRAM: Diagnosis Murder 9610-0488 CODE #:

Network

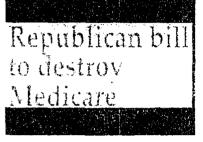
TIME: 24 Times Against Medicare 8:59 PM



(BKGD MUSIC) MALE ANNCR: It began



October 9th, 1995 and went on for two more days.



The biggest assault on Medicare ever seen in the Congress.



Twenty-four times, Dick Zimmer votes against Medicare.



He votes to cut benefits,



to raise premiums,



to limit your choice of doctor;



against coverage for colon cancer screening,



against coverage for mammograms,



against coverage for diabetes blood tests,



even against restoring safety standards in nursing homes.



Call Dick Zimmer. Tell him to stop cutting Medicare. (MUSIC ENDS)







MEMO

JOHN MCLAUGHLIN & ASSOCIATES

134 MAIN STREET, NEW CANAAN, CT 06840 (203) 972-5400 (203) 972-5415 FAX

Date:

OCTOBER 4, 1996

To:

DAVID MILLNER/LARRY WEITZNER

From:

DEBBY MCINTOSH

Re:

TORRICELLI MEDIA

PLEASE BE ADVISED OF THE FOLLOWING INFORMATION THAT I HAVE GATHERED FROM SALESPEOPLE IN THE NEW YORK TV MARKET.

ABAR HUTTON, THE AGENCY THAT IS BUYING THE MEDIA TIME FOR TORRICELLI IS ALSO BUYING TIME FOR THE DEMOCRATIC NATIONAL COMMITTEE.

ABAR HUTTON ORDERED THE TORRICELLI SCHEDULE THRU NOVEMBER 4TH. ABAR HUTTON HAS NOW CALLED THE TV STATIONS TO CHANGE PART OF THIS ORDER TO NOW RUN FOR THE DEMOCRATIC NATIONAL COMMITTEE WHICH IS NOW PAYING ISSUE RATES.

PLEASE LET ME KNOW IF YOU NEED ANYTHING FURTHER.

THANK YOU.





Sponsor: Democratic National Committee.

Ad Firm: Shrum, Devine, Donilon, Washington.

Format: 30-second television ad.

Text

Announcer: "It began October 9th, 1995. And went on for two more days. The biggest assault on Medicare ever seen in the Congress. 24 times, Dick Zimmer votes against Medicare. He votes to cut benefits. To raise premiums. To limit your choice of doctor. Against coverage for colon cancer screening. Against coverage for mammograms. Against coverage for diabetes blood tests. Even against restoring safety standards in nursing homes. Call Dick Zimmer. Tell him to stop cutting Medicare."

Video

Capitol in background, black lettering: "October 9th, 1995"; "Republican bill to destroy Medicare"; white lettering on black screen: "24 Times Dick Zimmer votes against Medicare." Picture of Zimmer in corner, with videos of senior citizens, a doctor with patients, a woman patient, and a senior in a wheelchair, as lettering matches announcer statements. Ends with white lettering: "Call Dick Zimmer. Tell him to stop cutting Medicare. Call 202-225-5801."



	ABAR HUTTON MEDIA 1029 WEST ROYAL STREET		961004-	0018525 Al	T 3 10/08	3/96 13:52	:27	
	SUITE 330 ALEXANDRIA, VA 2231	DEMOCRATI	C NATIONAL	COMM.WABC-	PV, INC.			
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	8	305	PCON=805	ACON=		210749		
	1046 1963 1521 4	49	BARB ABAR	? /				
	10/07/96 10/13/96	M	1	ı				

5	M-F(R)	658A 857A	30	10/07-10/11	2	2	1,20
6	M-F(R)	858A1130A	30	10/07-10/11	2	1	1,20
7	M-F(R)	1231P 357P	30	10/07-10/11	2	2 .	1,80
8	M-F(R)	358P 457P	30	10/07-10/11	2	3	3,20
12	M-F(R)	658P 756P	30	10/07-10/11	2	4	7,50
13	M-F(R)	1204A1207A	30	10/07-10/11	2	2	4,00
9	T-SU(R)	1133P1135P	30	10/08-10/13	2	2	7,50
15	T-F(R)	1204A1207A	30	10/08-10/11	1	1	_4,00
14	SA-SU	1136P 135A	30	10/12-10/13	2	2	9(
4	F 20/20*******	958P1100P	30	10/11	2	1	26,00
3	SU ABC SUNDAY NIGHT	858P1100P MOVIE***	30	10/13	2	1	15,0
1	SU AMERICA'S FUNNI	658P 800P EST lome V	30	10/13	2	1	15,0
2	T TUES COMEDY BLO	758P1000P CK	30	10/08	2	ı	20,0
10	SA EARLY NEWS	658P 730P	30	10/12	2	1	3,0

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	ABAR HUTTON MEDIA 1029 WEST ROYAL STREET SUITE 330 ALEXANDRIA, VA 22314 BARB ABAR 805		961004-001852S A1 T 2 10/08/96 13:52:27							
SU			DEMOCRATIC NATIONAL COMM. WABC-TV, INC.							
			DEMOCRATIC NATIONAL PA/MD RIZZUTO						O, DEF	
			PCON=805		AC	ACON=		21074		19
-	1046 1963 1521	449	BARB	ABAI	2	/				
10,	/07/96 10/13/96	M	1		1					
5	M-F(R)	650X	0571	20 1	0.407	20/22		2	2	2 26
	• •				LO/07~	•		-,	2	1,20
6	M-F(R)	858A3	L130A	30 1	LO/07-	10/11		2	1	1,20
7	M-F(R)	1231P	357P	30 1	LO/07-	10/11		2	2	. 1,8C
8	M-F(R)	358P	457P	30 1	10/07-	10/11		2	3	3,20
12	M-F(R)	658P	756P	30 1	10/07-	10/11		2	4	7,50
13	M-F(R)	1204AJ	.207A	30 1	LO/07-	10/11		2	2	4,00
9	T-SU(R)	1133PJ	.135P	30 1	LO/08-	10/13		2	2	7,50
15	T-F(R)	1204A1	207A	30 1	LO/08-	10/11		1	1	4,00
14	SA-SU	1136P	135A	30 1	L 0/12 -	10/13		2	2	90
4	F 20/20******	958P1 ******		30 1	10/11			2	1	26,00
3	SU ABC SUNDAY NIGH	858PI IIVOM TH		30 1	LO/13 ·		•	2	1	15,00
1	SU AMERICA'S FUNN	658P IEST HON	800P Œ V	30 1	L 0/13			2	1	15,00
2	T TUES COMEDY BLO		L000P	30 1	LO/08		,	2	1	20,00
10	sa Early News	658P	730P	30 1	10/12			2	1	3,00





ABAR HUTTON MEDIA 961004-001852S A1 T 2 10/08/96 13:52:27 1029 WEST ROYAL STREET SUITE 330 DEMOCRATIC NATIONAL COMM. WABC-TV, INC. ALEXANDRIA, VA 22314 DEMOCRATIC NATIONAL PA/MD RIZZUTO, DEE/ BARB ABAR 805 PCON=805 ACON= X 210749 1046 1963 1521 449 BARB ABAR 1 10/07/96 10/13/96 M 1 1

11 SU 558P 630P 30 10/13 2 1 3,000 EARLY NEWS

OCT96 157,600.00

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TOTAL SPOTS
TOTAL EXPIRED
TOTAL SCHEDULED 157,600
TOTAL GROSS 157,600
COMMISSION 23,640
TOTAL NET 133,960





ABAR HUTTON MEDIA 961004-001851S A1 T 2 10/08/96 13:52:27 1029 WEST ROYAL STREET SUITE 330 DEMOCRATIC NATIONAL COMM. WABC-TV, INC. ALEXANDRIA, VA 22314 DEMOCRATIC NATIONAL PA/MD RIZZUTO, DEF BARB ABAR 805 PCON=805 ACON= 210748 1046 1963 1521 449 BARB ABAR 10/14/96 10/14/96 M 1 ٠1.

1 M 758P 900P 30 10/14 2 1 10,00 2 M 1232A1245A 30 10/14 2 1 4,00 WABC EYEWITNESS NEWS MOND

OCT96 14,000.00

TOTAL SPOTS
TOTAL EXPIRED
TOTAL SCHEDULED 14,00
TOTAL GROSS 14,00
COMMISSION 2,10
TOTAL NET 11,90

